



# **PLANNING APPLICATION FOR A RENEWABLE ENERGY CENTRE AND AN INDUSTRIAL/WAREHOUSE BUILDING**

**FORT INDUSTRIAL PARK, CASTLE BROMWICH,  
BIRMINGHAM**

## **PLANNING STATEMENT**

**ON BEHALF OF ROLTON KILBRIDE**

**TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)  
PLANNING AND COMPULSORY PURCHASE ACT 2004**

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## 1. INTRODUCTION

- 1.1 This Planning Statement accompanies a planning application which is submitted on behalf of Rolton Kilbride<sup>1</sup> (“the Applicant”) in respect of the construction of a Renewable Energy Centre using an Advanced Conversion Technology process called gasification to generate power and heat from Refuse Derived Fuel together with other non-recyclable wastes, and the erection of an industrial/warehouse building and a gatehouse on land at Fort Industrial Park, Castle Bromwich, Birmingham (“the application site”).
- 1.2 The Site Location Plan accompanying the planning application identifies the location of the application site in relation to the industrial estate and the wider urban area.

### Summary description of development

- 1.3 The proposed development will be comprised by the following elements:
- Demolition of existing industrial buildings;
  - Construction of a Renewable Energy Centre (REC) on the southern part of the site which will employ an Advanced Conversion Technology (ACT);
  - Construction of a new industrial/warehouse building to include storage and offices to the northern part of the site;
  - Landscaping proposals to enhance the existing environment; and
  - Associated works and infrastructure necessary for the implementation of the development.
- 1.4 A full description of the development proposals which sets out the various aspects of the scheme, including the technology to be used by the REC, types of waste to be used, anticipated vehicular movements and job generation, can be found in Section 3 of this Statement.

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<sup>1</sup> Acting on behalf of the Industrial Property Investment Fund

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### Background to the Applicant

- 1.5 The Applicant, Rolton Kilbride, is a collaboration between Rolton Group, a multi-disciplined engineering consultancy with specialism in clean-technology and Kilbride, which offers expertise in development and infrastructure. An opportunity was identified to create a potential new source of energy for local businesses by Legal & General Property (LGP), who manage the land at Fort Industrial Park on behalf of owners Industrial Property Investment Fund. As one of the largest institutional investors and property fund managers in the UK, LGP has a strong commitment to sustainability. An opportunity was identified to create a REC on one of LGP's sites, producing lower cost renewable energy for local businesses, providing a secure, predictable and sustainable off-grid energy source. This offers significant reductions in carbon footprint and utilises a renewable fuel.
- 1.6 Rolton Kilbride has an established track record working with LGP on a number of projects, the most relevant in the local area being the outbound logistics/rail terminal for Jaguar Cars next to the proposed REC.
- 1.7 Rolton Kilbride are currently working on a portfolio of other REC projects which include sites in Swindon, Rotherham and Northampton.
- 1.8 The Anglo Norwegian firm Energos will provide the plant and technology for the REC. Three plants are under construction in Milton Keynes, Derby and Glasgow using the same technology.

### Contracts for Difference

- 1.9 The award of a UK Government Contracts for Difference (CfD) contract is a vitally important part of the commercial viability of the Fort Parkway Energy project. A CfD contract enables the project to gain an index linked, government backed revenue stream for 15 years. The CfD are only available to certain renewable technologies, which the government is supporting and promoting as part of a wider plan to develop a decarbonised economy.
- 1.10 The Fort Parkway Energy Centre, as a CfD qualifying project must apply for a CfD before both construction and financial close. However, in order to demonstrate to the Department for Energy and Climate Change (DECC) that the project will be commissioned, certain conditions must be met before applying for a CfD contract:

- Planning permission;
- A signed grid connection offer; and
- Declaration that the project is not in receipt of RO or FiT payments.

1.11 The allocation rounds run once a year and the next one is currently scheduled for October 2016. In order to meet all the pre-qualification criteria and complete the application in a timely manner, the project must secure planning permission as soon as possible.

#### The Purpose and Content of the Planning Statement

1.12 This Planning Statement identifies the planning policy framework within which the planning application is to be considered. It also identifies other key issues relevant to the consideration of the planning application and sets out the steps now necessary for the implementation of the scheme.

#### Pre application discussions

1.13 The Applicants have been engaged in a pre-application consultation process with Birmingham City Council ("the LPA") prior to the submission of the planning application. The advice received was broadly supportive of the proposals in principle, including guidance setting out the planning policy context that an application would be judged against and an indication of the documentation necessary to support an application.

#### Screening / Scoping Opinion

1.14 Pegasus Group submitted a request for a Scoping Opinion under Regulation 13 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 to Birmingham City Council (BCC) on 29<sup>th</sup> July 2015 to determine the required scope of the Environmental Impact Assessment (application ref. 2015/06426/PA).

1.15 The LPA responded on 8<sup>th</sup> September 2015 concluding that they were in general agreement with the findings of the Scoping Report submitted by Pegasus Group on behalf of the Applicant as a basis for assessment within the Environmental Statement (ES), subject to a number of recommendations and further responses to be received from statutory consultees.

1.16 A copy of the Scoping Opinion from BCC is attached at Appendix 1.

**APPENDIX 1 – SCOPING OPINION DATED 8<sup>TH</sup> SEPTEMBER 2015**

## 2. APPLICATION SITE AND SURROUNDINGS

- 2.1 The application site is located within the Fort Industrial Park, off Dunlop Way in the Castle Bromwich area of Birmingham.
- 2.2 The industrial park as a whole comprises 26 units that comprise single storey industrial/warehouse and trade counter buildings with internal offices, service yard and parking.
- 2.3 The application site extends to approximately 1.91ha in size and is surrounded by a network of motorways, main roads (dual and single carriageway) and other roads. To the north and west of the site are extensive areas of large industrial units and car storage, including the Jaguar Land Rover Castle Bromwich manufacturing plant. To the east of the site, beyond the A452 dual carriageway, is the residential area of Castle Vale, separated by the mainline railway from further industrial units to the south. To the south of the site is the mainline railway line, a hotel (the Castle Bromwich Inn), an elevated section of the M6 motorway, and areas of residential development, including the parkland associated with castle Bromwich Hall and a number of other areas of green space.
- 2.4 The application site is not subject to any statutory or non-statutory landscape designations.
- 2.5 The Grade II\* Registered Park and Garden at Castle Bromwich Hall lies approximately 600m to the south-south-east of the application site, but is separated by an elevated section of the M6. The locally listed Fort Dunlop building lies approximately 750m to the west of the application site, and there are a number of other Listed Buildings in the local area, notably those in the vicinity of Castle Bromwich Hall and those to the north of the Jaguar plant.
- 2.6 The River Tame lies to the south of the application site, between the railway line and the M6 motorway.

### 3. DESCRIPTION OF PROPOSALS

3.1 The proposed development will involve the demolition of all existing industrial buildings on the land and principally comprise the construction of a REC powered by an Advanced Conversion Technology process called gasification and the erection of a new industrial/warehouse building.

#### Renewable Energy Centre

3.2 The REC will employ an ACT – a form of gasification process to generate power and heat from Refuse Derived Fuel (RDF) together with other non-recyclable wastes. RDF is a product derived from non-recyclable industrial and commercial waste and when heated to very high temperatures breaks down to provide a gas which can be used to create energy utilised in a boiler to create steam which drives a steam turbine to produce electricity and heat. It is a clean, modern and hi-tech approach to producing energy, with a proven track record supported by the European and UK Governments.

3.3 The proposed development will have the capacity to process up to 105,000 tonnes of waste per annum. As well as the RDF, the feed stock will include using non-recyclable residual commercial and industrial waste (CIW) together with an element of construction and demolition (C&D) and potentially municipal solid waste (MSW). The plant will not accept hazardous or clinical waste. It is anticipated that feedstock would comprise waste from across the greater Birmingham area.

3.4 The facility will have a capacity to produce a gross 8.6MW of electricity and heat available for district heating. The technology employed by Fort Parkway Energy will involve a two-stage system, which initially gasifies the waste to produce synthetic gas. This gas is then transferred to a second stage where it burns more efficiently as a fuel than would be the case from a basic waste incineration system. The process allows for efficient control of emissions and improved performance generally as an energy solution.

3.5 The proposed REC will be made up of the following principal elements:

- A main building – this will house the majority of process plant and will have a flue stack and a number of silos to the rear. All waste material will be unloaded inside the building. At its highest point, the main body of the

building will be 23m high and the flue stack will have a height of 55m and a diameter of 2.1m. In comparison the Rolls Royce peaking plant which is adjacent to the site is larger with an exhaust stack height of 60.4m and 4.5m diameter;

- Turbine room;
- Air cooled condenser fans;
- Ash bunker;
- Fire water tank;
- Pump room; and
- Technical / control room and workshop.

3.6 In addition, the external site areas will include:

- Two weighbridges (both in and out);
- Site entrance and circulation roads;
- Car parking including disabled bays;
- Provision for cycling spaces; and
- Landscaping and Sustainable Urban Drainage System.

3.7 In terms of architectural detailing and materials, a cladding system will be used to meet the functional and aesthetic needs of the building. For the base, a horizontal metal cladding is proposed in a dark grey colour, a common architectural technique that gives the building a strong base or plinth to sit on. Above that there will be a lighter grey and finally a white architectural panel to the top third of the building. The concept behind this is explained in the Design and Access Statement that accompanies the planning application.

#### Industrial/Warehouse Building

3.8 In addition to the REC, the planning application also proposes the construction of a new industrial/warehouse building to include storage and offices which will be constructed to the northern part of the site fronting onto Fort Parkway. The

building will be of a smaller scale to the REC measuring approximately 12m in height. In terms of architectural detailing and materials, the proposed building will follow a similar palette to the REC, albeit simplified, consisting of mainly coloured cladding systems. The building will have its own access, parking and turning areas, and areas of hard and soft landscaping.

#### Gatehouse

- 3.9 A gatehouse building will be constructed to replace the existing gatehouse that will be demolished to accommodate the proposed industrial/warehouse building and will be a modest single-storey building.

#### Operational Activities

- 3.10 As discussed above the REC employs a two stage system that first gasifies the waste to produce a synthetic gas which is then transferred to a second stage where it is oxidised. Changing the waste to a gas fuel, means the burning environment can be finely controlled, dioxins thoroughly destroyed and Nitrogen Oxides (NOx) emissions minimised to a level that are compliant with the European Union Industrial Emissions Directive (EU IED).
- 3.11 It is anticipated that fuel from the local area would fulfil the requirement to operate the REC. This is however subject to available local contracts and is currently under review by the Applicant. The waste will likely be split into three types:
- Tier 1 from the major waste companies which would account for approximately 60% of the waste entering the plant;
  - Tier 2 would consist of waste from local operators and would account for 30% waste; and
  - Tier 3 where 10% of the waste would come from spot market.
- 3.12 Economic viability will play a large factor in the distance waste is travelled to the site hence for this reason waste will not be transported over long distances. Although waste from Tier 1 would be transported from major waste organisations it would still originate from the Birmingham area. The tiers represent different size operators as opposed to the distance the waste is brought into the site. The distance will be self-limiting owing to transport cost.

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Hours of operation

- 3.13 The proposed REC will be operational for 24 hours a day, 7 days a week, including Bank Holidays. Operational staff would be required to operate the plant on a 3 shift pattern (each of 8 hours).
- 3.14 It is anticipated that operations conducted from the industrial/warehouse building will be operated during normal business hours.

Vehicle Movements

- 3.15 The waste will be delivered to the site via refuse collection vehicles (RCVs) which will typically be 18 – 22 tonnes vehicle (gross weight), or in large articulated bulk haulage vehicles from nearby waste transfer stations.
- 3.16 It is anticipated that the proposed REC will generate a total of 66 heavy goods vehicles (HGVs) per day (33 In / 33 Out). The plant is designed to operate continuously, 24 hours a day, 7 days per week. The facility will be open for deliveries between the hours of 07:00 and 19:00 Monday to Friday including Bank and Public Holidays (excluding Christmas and New Year's Day) and 07:00 to 14:00 on Saturdays. There will be no waste received on Sundays. It is expected that HGVs importing and exporting materials from the site will do so evenly throughout the 12 hour period and there is unlikely to be a peak in movements associated with these operations.
- 3.17 It is also expected that 20 operational staff would be required to operate the plant on a 3 shift pattern. On a worst case basis, all staff would travel to the site by car giving rise to the generation of a total of 40 trips per day (20 In / 20 Out) by private motor vehicle.

Parking

- 3.18 The proposed level of car parking has been based upon the expected number of users at the site and in this regard, the REC will provide a total of 19 car parking spaces, inclusive of 2 disabled bays. Whilst the proposed industrial/warehouse building will accommodate a total of 29 car parking spaces, inclusive of 2 disabled bays.
- 3.19 A detailed parking layout is provide of the site layout drawings accompanying the planning application which identify how sufficient parking spaces and vehicle

manoeuvring space can be provided within each part of the application site in the interests of highway safety.

### Staff

- 3.20 The proposed REC will create a number of job opportunities during the construction phase of the development and once operational this will provide up to 20 employment opportunities, which will comprise of 13 FTE's directly employed on site with a further 7 people providing services from local specialist businesses. These will be across a variety of skills and levels of expertise and there will be employment opportunities for local people. There will also be indirect effects of cheaper energy to local businesses which may lead to expansion and therefore additional job creation within those businesses.
- 3.21 Furthermore, there will be approximately 28 job opportunities<sup>2</sup> created by the proposed warehouse to the front of the site.

### Construction

- 3.22 Subject to the grant of planning permission, it is anticipated that the construction of the proposed REC would commence in 2017. Construction on site would last for 24 months, after which there would be a 6 month commissioning period. Construction would normally take place during the hours of 07:00 to 18:00 (Monday to Friday) and 07:00 to 14:00 (Saturday). No construction would take place on Sundays or Bank Holidays.

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<sup>2</sup> Employment estimate based on Employment Densities Guide, 2nd Edition 2010 by Drivers Jonas Deloitte, published by the Homes & Communities Agency.

#### 4. NATIONAL PLANNING POLICY AND GUIDANCE

##### National Planning Policy Framework (March 2012)

- 4.1 The **National Planning Policy Framework** (“the NPPF”) was published on 27<sup>th</sup> March 2012. The NPPF replaced much of the previous suite of National Planning Policy Statements, Planning Policy Guidance Notes and some Circulars with a single, streamlined document.
- 4.2 In terms of waste, **Paragraph 5** advises that the NPPF does not contain specific waste policies, since national waste planning policy will be published as part of the National Waste Management Plan for England. However, it goes on to advise that local authorities when preparing waste plans and taking decisions on waste applications should have regard to policies in the Framework as far as relevant. Further discussion on the National Planning Policy for Waste is provided below between paragraphs 4.28 and 4.31 of this Statement.
- 4.3 Elsewhere in the document, the NPPF sets out the Government’s planning policies for England and how these are expected to be applied under the ‘**presumption in favour of sustainable development**’.
- 4.4 The NPPF is clear that planning decisions must be made in accordance with Planning Law. **Paragraph 2** states that planning law requires that applications for planning permission must be determined in accordance with the development plan, unless material considerations indicate otherwise.
- 4.5 The NPPF states that the purpose of the planning system is to contribute to the achievement of sustainable development by balancing the economic, social and environmental roles of development. These roles should not be undertaken in isolation as they are mutually dependent. To achieve sustainable development the planning system should therefore play an active role in guiding development to sustainable solutions (**paragraph 8**).
- 4.6 The overarching policy objective of the NPPF is the presumption in favour of sustainable development. This is the ‘golden thread’ that should run through both plan-making and decision-taking. **Paragraph 14** states that, for decision-taking, this means approving development proposals that accord with the development plan without delay. Where the development plan is absent or silent or where policies are out-of-date, planning permission should be granted unless

any adverse impacts would significantly and demonstrably outweigh the benefits, or specific policies in the Framework indicate development should be restricted.

- 4.7 Section 1 of the NPPF focuses upon building a strong, competitive economy. **Paragraph 19** highlights the Government's commitment to ensuring that the planning system does everything it can to support sustainable economic growth. Planning should operate to encourage and not act as an impediment to sustainable growth. Significant weight should be placed on the need to support economic growth through the planning system.
- 4.8 Sections 2, 3, 5, 6, 8 and 9 of the NPPF are not relevant to the proposed development in this location.
- 4.9 Section 4 relates to the promotion of sustainable transport wherein **Paragraph 34** of the NPPF confirms that plans and decisions should ensure that developments that generate significant movements are located where the need to travel is minimised. **Paragraph 35** goes on to advise that plans should protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people. Therefore, developments should be located and designed where practical to, inter alia, accommodate the efficient delivery of goods and supplies.
- 4.10 In respect of climate change the NPPF (at Section 10, **paragraphs 93 to 98**) identifies the key role the planning system has to play in supporting the delivery of renewable energy, which is considered central to the economic, social and environmental dimensions of sustainable development. In helping to increase the use and supply of renewable energy LPAs must recognise the responsibility on all communities to contribute to energy generation and have a positive strategy to promote renewable energy with policies designed to maximise renewable energy whilst ensuring that adverse impacts are addressed.
- 4.11 **Paragraph 98** adds that, in determining planning applications, there is not a requirement for applicants to demonstrate the overall need for renewable or low carbon energy and LPAs are required to recognise that small-scale renewable schemes provide a valuable contribution to cutting greenhouse gas emissions. It is also confirmed that LPAs should approve applications for renewable energy generation if its impacts are (or can be made) acceptable.

- 4.12 In terms of conserving and enhancing the natural environment, **Paragraph 111** advises that planning policies and decision should encourage the effective use of land by re-using land that has been previous developed (brownfield land), provided that it is not of high environmental value.
- 4.13 **Paragraph 123** states the planning policies and decisions should aim to avoid unreasonable noise impact, whilst **Paragraph 124** confirms that planning policies should sustain compliance with and contribute towards national objectives for pollutants, taking into account the presence of Air Quality Management Areas, and that new development should be consistent with the local Air Quality Action Plan. Furthermore, **Paragraph 125** encourages a good design (of built development) to limit the impact of light pollution from artificial light on local amenity and nature conservation.
- 4.14 Under the 'Decision-taking' sub-heading, **Paragraphs 186 and 187** relate to the decision making process (for all types of development) and LPAs are advised that they should "*approach decision taking in a positive way to foster the delivery of sustainable development*" and "*seek to approve applications for sustainable development where possible*". **Paragraph 187** concludes by stating that authorities "*should work proactively with applicants to secure developments that improve the economic, social and environmental conditions of the area*".
- 4.15 **Paragraph 196** reaffirms the initial sentiments of the NPPF, confirming that the planning system is plan-led and that "*planning law requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise and that the NPPF is a material consideration in the planning process.*" **Paragraph 197** states "*in assessing and determining development proposals, local planning authorities should apply the presumption in favour of sustainable development*".

Waste Management Plan for England (December 2013)

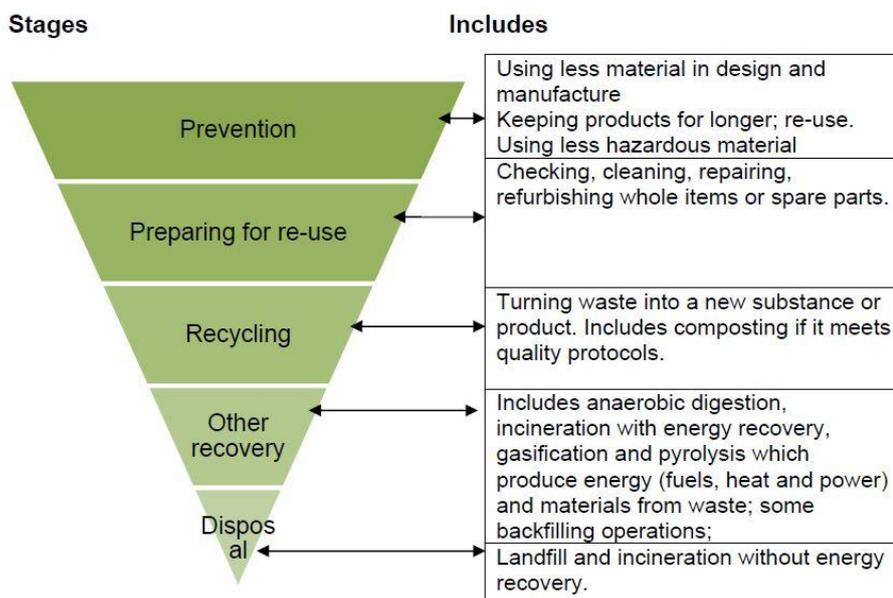
- 4.16 The **Waste Management Plan for England** ("the WMPE") was published in December 2013 and sets out where the Government is now in terms of the waste generated in England and how those materials can be managed. It supersedes and records progress made since the publication of the Waste Strategy for England 2007.

4.17 The introduction to the document sets out how the WMPE is a high level document which is non-site specific. It provides an analysis of the current waste management situation in England, and evaluates how it will support implementation of the objectives and provisions of the revised Waste Framework Directive (WFD). It goes on to say that:

**“National planning policy on waste is currently set out in Planning Policy Statement 10 ‘Planning for Sustainable Waste Management’. It provides the planning framework to enable local authorities to put forward, through local waste management plans, strategies that identify sites and areas suitable for new or enhanced facilities to meet the waste management needs of their areas. This policy is currently being updated and has been subject to public consultation. Once it has been finalised, the updated policy will replace Planning Policy Statement 10 as the national planning policy for sustainable waste management.”**

4.18 Page 10 of the document sets out how the Government are working towards moving beyond our current throwaway society to a ‘zero waste economy’ in which material resources are reused, recycled or recovered wherever possible and only disposed of as the option of last resort.

4.19 At page 11 it details how the waste hierarchy in England is enshrined in law through the Waste (England and Wales) Regulations 2011. The waste hierarchy is set out below with top priority given to waste prevention, followed by preparing for re-use, then recycling, other types of recovery (including energy recovery), and last of all disposal (e.g. landfill).



- 4.20 In terms of 'Other Recovery', in addition to supporting anaerobic digestion the Government also supports efficient energy recovery from residual waste – of materials which cannot be reused or recycled - to deliver environmental benefits, reduce carbon impact and provide economic opportunities. The Government aims to get the most energy out of waste, not to get the most waste into energy recovery (page 13).
- 4.21 To achieve this pages 32 and 33 set out that the Government will ensure the right incentives are in place to develop this industry. The Government does not express a preference for one technology over another, since local circumstances differ. Any given technology is more beneficial if both heat and electricity can be recovered. Particular attention should therefore be given to the location of the plant to maximise opportunities for heat use.

National Planning Practice Guidance (March 2014, as amended)

- 4.22 On the 6<sup>th</sup> March 2014 the Department for Communities and Local Government (DCLG) launched the web-based **National Planning Practice Guidance** ("the NPPG"). It follows a review of planning policy guidance undertaken by Lord Taylor of Goss Moor which began in October 2012 and replaces a raft of old guidance.
- 4.23 The web-based format allows DCLG to update the NPPG electronically periodically, and for the avoidance of doubt, where this Statement relies upon the advice, reference is drawn to the date the relevant section of the guidance was published.
- 4.24 The most relevant guidance in the NPPG to the application is set out in the section entitled 'Waste' and in particular paragraphs 002, 009 and 046<sup>3</sup>.
- 4.25 **Paragraph 002** sets out a list of matters which can be considered as waste operations. Whilst it indicates that it is a non-exhaustive list and though interpretation is ultimately a matter for the courts, it identifies energy from waste incineration and other waste incineration as "waste development".
- 4.26 **Paragraph 009** explains that national waste policy is capable of being a material consideration in decisions on planning applications for waste management facilities.

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<sup>3</sup> National Planning Practice Guidance, Paragraph: 002 Reference ID: 28-002-20141016; Paragraph 009 Reference ID: 28-009-20141016 & Paragraph 046 Reference ID: 28-046-20141016

4.27 **Paragraph 046** describes when unallocated sites can be used, it advises there may be significant changes in, for example, technological impact and land ownership that occur over a short period of time and provide opportunities that were not anticipated. If a proposal is consistent with an up to date Local Plan then there is no need to demonstrate 'need'.

National Planning Policy for Waste (October 2014)

4.28 The **National Planning Policy for Waste** ("the NPPW") was published in October 2014 and replaces the guidance previously saved following the publication of the NPPF which had been set out in Planning Policy Statement 10: Planning for Sustainable Waste Management (PPS10).

4.29 **Paragraph 1** acknowledges that the WMPE sets out the Government's ambition to work towards a more sustainable and efficient approach to resource use and management. It goes on to say that positive planning plays a pivotal role in delivering this country's waste ambitions through:

- delivery of sustainable development and resource efficiency, including provision of modern infrastructure, local employment opportunities and wider climate change benefits, by driving waste management up the waste hierarchy (see page 5 of this report);
- ensuring that waste management is considered alongside other spatial planning concerns, such as housing and transport, recognising the positive contribution that waste management can make to the development of sustainable communities;
- providing a framework in which communities and businesses are engaged with and take more responsibility for their own waste, including by enabling waste to be disposed of or, in the case of mixed municipal waste from households, recovered, in line with the proximity principle;
- helping to secure the re-use, recovery or disposal of waste without endangering human health and without harming the environment; and
- ensuring the design and layout of new residential and commercial development and other infrastructure (such as safe and reliable transport links) complements sustainable waste management, including the

provision of appropriate storage and segregation facilities to facilitate high quality collections of waste.

4.30 In terms of determining planning applications for waste development, **paragraph 7** advises that waste planning authorities should:

- only expect applicants to demonstrate the quantitative or market need for new or enhanced waste management facilities where proposals are not consistent with an up-to-date Local Plan. In such cases, waste planning authorities should consider the extent to which the capacity of existing operational facilities would satisfy any identified need;
- recognise that proposals for waste management facilities such as incinerators that cut across up-to-date Local Plans reflecting the vision and aspiration of local communities can give rise to justifiable frustration, and expect applicants to demonstrate that waste disposal facilities not in line with the Local Plan, will not undermine the objectives of the Local Plan through prejudicing movement up the waste hierarchy;
- consider the likely impact on the local environment and on amenity against the criteria set out in Appendix B (see paragraph 4.31 of this Statement) and the locational implications of any advice on health from the relevant health bodies. Waste planning authorities should avoid carrying out their own detailed assessment of epidemiological and other health studies;
- ensure that waste management facilities in themselves are well-designed, so that they contribute positively to the character and quality of the area in which they are located;
- concern themselves with implementing the planning strategy in the Local Plan and not with the control of processes which are a matter for the pollution control authorities. Waste planning authorities should work on the assumption that the relevant pollution control regime will be properly applied and enforced;
- ensure that land raising or landfill sites are restored to beneficial after uses at the earliest opportunity and to high environmental standards through the application of appropriate conditions where necessary.

4.31 In testing the suitability of sites and areas in the preparation of Local Plans and in determining planning applications, waste planning authorities should consider the factors below. These are set out in **Appendix B**. They should also bear in mind the envisaged waste management facility in terms of type and scale. The criteria are:

- a. protection of water quality and resources and flood risk management;
- b. land instability;
- c. landscape and visual impacts;
- d. nature conservation;
- e. conserving the historic environment;
- f. traffic and access;
- g. air emissions, including dust;
- h. odours;
- i. vermin and birds;
- j. noise, light and vibration;
- k. litter; and
- l. potential land use conflict.

Overarching National Policy Statement for Energy (EN-1) (July 2011)

4.32 The **Overarching National Policy Statement for Energy (EN-1)** was published by the Department of Energy & Climate Change (DECC) in July 2011 and sets out the national policy for the energy infrastructure. Whilst relevant to projects in excess of 50MW, **paragraph 1.2.1** explains that it may be a material consideration in decision making on applications that fall under the Town and Country Planning Act 1990 (as amended).

4.33 **Paragraph 3.4.1** sets out the UK commitments to sourcing 15% of energy from renewable sources by 2020. To hit this target, and to largely decarbonise the power sector by 2030, EN-1 states that:

**“It is necessary to bring forward new renewable electricity generating projects as soon as possible. The need for new renewable energy electricity generation projects is therefore urgent.”**

4.34 The National Policy Statement sets out how the energy sector can help deliver the Government’s climate change objectives by clearly setting out the need for new low carbon energy infrastructure to contribute to climate change mitigation.

4.35 In terms of Energy from Waste (EfW), **paragraph 3.4.3** confirms that:

**“...the principal purpose of the combustion of waste, or similar processes (for example pyrolysis or gasification) is to reduce the amount of waste going to landfill in accordance with the Waste Hierarchy and to recover energy from that waste as electricity or heat. Only waste that cannot be re-used or recycled with less environmental impact and would otherwise go to landfill should be used for energy recovery. The energy produced from the biomass fraction of waste is renewable and is in some circumstances eligible for Renewables Obligation Certificates, although the arrangements vary from plant to plant”**

4.36 **Paragraph 3.4.4** recognises that the ability of EfW to deliver predictable, controllable electricity which is increasingly important in ensuring the security of UK supplies.

National Policy Statement for Renewable Energy Infrastructure (EN-3) (July 2011)

4.37 The **National Policy Statement for Renewable Energy Infrastructure (EN-3)** was also published by DECC in July 2011 and sets out the national policy for renewable energy projects. EN-3 should be read in conjunction with EN-1.

4.38 Similar to EN-1, EN-3 sets out the importance of renewable energy in achieving the Government’s ambitious targets for renewable energy generation, highlighting that a significant increase in generation from large-scale renewable energy infrastructure is necessary to meet the 15% renewable energy target.

4.39 **Paragraph 2.5.2** acknowledges that the recovery of energy from the combustion of waste will play an increasingly important role in meeting the UK’s energy needs. It goes on to say that where the waste burned is deemed renewable, this can also contribute to meeting the UK’s renewable energy targets. The paragraph concludes by advising that the recovery of energy from the combustion

of waste forms an important element of waste management strategies in both England and Wales.

## 5. LOCAL PLANNING POLICY

### Adopted Planning Policy

#### *Birmingham Unitary Development Plan*

- 5.1 The **Birmingham Unitary Development Plan** (UDP) was adopted by Birmingham City Council on 11<sup>th</sup> November 2005 and contains policies and proposals that currently guide development and land use across the City.
- 5.2 In September 2008, the Secretary of State issued a Direction that saved all but three policies in the UDP until such time they are replaced by emerging Development Plan Documents. In the meantime, the 'saved' policies of the UDP are the basis against which planning decisions are taken subject to their degree of consistency with the NPPF.
- 5.3 The principal saved policy in the adopted UDP applicable to an EfW facility is set out a **Paragraph 3.67 (Energy from Waste Plants)** which states:

**"Waste incinerators can provide an efficient means of reducing the amount of waste for disposal, and an opportunity for energy recovery. At present (2004) more than 65% of the City's household waste is processed at the energy from waste plant in Tyseley and this generates enough power to run a leisure centre and several blocks of flats. However, it is acknowledged that, where it is a practical and viable option, the re-use or recycling of waste products is preferable to incinerating waste. The City Council will therefore investigate alternative options for processing household waste which would reduce the need for it to be incinerated, such as expanding the kerbside collection of recyclable materials, and developing a new Materials Recycling Facility. Proposals for the expansion of the existing energy from waste facility at Tyseley or for new energy from waste plants will be considered in the light of the policy set out in paragraphs 3.65A – 3.65C above."**

- 5.4 *Assessment* – see paragraphs 6.5 to 6.19 of this Statement.
- 5.5 Other relevant waste related saved policies are set out between **Paragraphs 3.64A – 3.65C (Waste Treatment and Management)**. These policies state:

**"3.64A - The Council will adopt a sustainable approach to waste management which seeks to ensure that adequate facilities exist for the treatment and disposal of waste within the City, achieving the best balance of social,**

**environmental and economic costs and benefits, and taking account of the following principles:**

- **Consideration of the best practicable environmental option for each waste stream;**
- **Regional self sufficiency;**
- **The proximity principle; and**
- **The waste hierarchy.**

.....

**3.65A – In the meantime, the City Council’s policy is that the development of all new waste management, processing and treatment facilities should be provided in accordance with current national and regional planning guidance, should be in appropriate locations, and should be sited so that they minimise any adverse impacts on local communities, the environment and the local transport network. Where appropriate, the City Council will require mitigation such as protective screening and/or landscaping to minimise the impact of such facilities on adjacent areas. Proposals for different types of facility will be assessed against the criteria set out in the following paragraphs.**

**3.65B – The following types of location are regarded as being suitable for developments that involve the management, treatment and processing of wastes:**

- a) **Industrial areas, especially those containing other heavy or specialised industrial uses;**
- b) **Degraded, contaminated or derelict land, provided that any nature conservation issues are adequately addressed by the development;**
- c) **Existing or former landfill sites, provided that any problems of contamination and/or gas migration can be safely addressed;**
- d) **Existing or redundant sites or buildings which can be re-used or adapted;**
- e) **Sites previously occupied by other types of waste management facilities; and**
- f) **Other suitable sites located adjacent to railways, canals, or major junctions in the road network.**

**New energy from waste plants, incinerators, scrapyards, waste transfer stations, brickcrushers and other waste management, treatment and processing facilities that are likely to cause noise, disturbance, air pollution, smells and other nuisances, are expected to be located within existing industrial areas, and will not be permitted in or adjacent to residential areas, unless any adverse environmental impacts can be adequately mitigated.**

**3.65C – When considering proposals for new or expanded waste management, treatment and processing facilities, the City Council will take the following into account:**

- **The need for the facility and its proximity to the source of the waste to be treated;**
- **The impact that the facility is likely to have upon the environment and adjoining uses, particularly in relation to sensitive land uses such as residential areas and nature conservation areas;**
- **The need for pollution control measures appropriate to the type of wastes to be processed or handled;**
- **The effectiveness or appropriateness of any measures proposed to mitigate or overcome any adverse environmental impacts;**
- **The impact of traffic generated by the proposal and the potential to transport bulky goods by more sustainable transport modes, e.g. rail or canal.**

5.6 *Assessment* – see paragraph 5.4 of this Statement.

5.7 Other relevant saved policies to the development of an EfW facility at the Fort Industrial Park are set out below.

5.8 **Paragraphs 3.14 – 3.14C (The Design of New Development)** recognises that a high standard of design is essential to the continued improvement of Birmingham as a desirable place to live, work and visit. The design and landscaping of new developments will be expected to contribute to the enhancement of the City’s environment. Good design may also help to promote and secure sustainable forms of development. In order to ensure a high standard of design in all new developments, the City Council has set out a series of general good design principles. These are concerned with the design of and the relationship between buildings, streets, squares, parks, nature conservation areas, waterways and other spaces that make up the public domain. This includes the nature and quality of the public domain itself, the relationship of one part of the City with other parts, and the patterns of movement and activity which are thereby established.

5.9 In submitting applications for new development, including outline applications, developers will be expected to demonstrate that the scheme has been considered as part of its context. Apart from very minor applications affecting unlisted buildings outside conservation areas, and changes of use which do not affect the

character or appearance of an existing building, all development proposals should be accompanied by a short written statement setting out the design principles adopted. In addition, all proposals should be accompanied by plans, elevations and drawings or photographs showing the site and the proposed development in relation to the surrounding buildings and uses. Where appropriate, developers should also provide illustrations showing the impact of their proposals at a detailed level. In more complex schemes, pre-application discussions are recommended in order to avoid unnecessary delays at a later stage. Design statements should be part of such discussions.

5.10 *Assessment* – see paragraphs 6.20 to 6.26 of this Statement.

5.11 **Paragraph 3.16A (Trees and Landscape in the Urban Environment)**

explains how trees are important for their visual amenity, benefits to health, historical significance and nature conservation value. They help to improve air quality and can be used to screen development and soften building lines. The City Council will continue to protect trees through Tree Preservation Orders, planning conditions and conservation legislation. Developers will be expected to give priority to the retention of trees, hedgerows and natural features on development sites, and existing landscaping should also be kept and protected where possible. Where trees or hedgerows are lost as a result of development, replacement trees will be required and, wherever possible, replacement hedgerows. Suitable additional planting will be required to complement and enhance existing landscaping, where this will not result in the loss of other existing semi-natural habitats. Species planted should be appropriate to the locality, and a variety of species will be sought across the City.

5.12 *Assessment* – there are a number of existing deciduous trees and some shrubs around the perimeter of the application site, with further trees and shrubs beyond the boundary to the south, between the site and the railway line. There is also some limited grass and shrub areas along the western and northern boundaries. Approximately half (13) of the trees within the site will be retained and a further 17 new trees would be planted. The tree planting would take place at the end of the construction phase in order to prevent any damage to the new trees from construction activities and the existing and proposed trees would be managed to maximise their longevity and health throughout the operational phase of the proposed development. Accordingly, the proposed development will accord with the provisions of this saved policy.

- 5.13 **Paragraphs 3.20 – 3.24 (Conservation of the Built Environment)** advises that the historic legacy of Birmingham is considered to be of prime importance, especially as so much was demolished during the redevelopment of the 50s and 60s. Designated Conservation Areas within the City will continue to provide a powerful means of preserving the best of our historic and architectural heritage, the emphasis will be on protecting and enhancing the individual character and appearance of the particular area. Not all the City's buildings or areas of architectural interest enjoy statutory protection and consideration will therefore be given to the designation of new Conservation Area. Proposals which would adversely affect buildings or areas of architectural interest will not normally be allowed. In addition, a great number of other buildings within the City are of value because of their local historic, social or architectural interest. Many of these have been included on a 'local list' which will continue to be revised and updated, and every effort will be made to encourage the preservation of buildings of local interest. More generally, the quality of existing buildings and townscape will be taken into account in considering proposals for new development.
- 5.14 *Assessment* – see paragraphs 6.34 to 6.36 of this Statement.
- 5.15 **Paragraphs 3.37 – 3.40 (Nature Conservation)** recognises the importance of safeguarding and enhancing the natural environment of the City. This involves both the protection of existing areas of nature conservation importance and measures to improve the diversity and quality of wildlife habitats throughout the City. Development which may harm the integrity or continuity of landscape features which are of major importance for wild fauna and flora (including features such as river and stream corridors, canals, active and disused railway corridors, natural greenspaces, urban wasteland sites, hedgerows, ponds and small woods) will only be permitted where the reasons for development clearly outweigh the need to retain the feature and in such cases developers would be expected to provide appropriate mitigation measures. Appropriate management of features will be sought by the imposition of conditions, by the use of planning obligations, and by concluding management agreements with landowners and developers.
- 5.16 *Assessment* – see paragraphs 6.37 to 6.41 of this Statement.
- 5.17 **Paragraphs 3.71 – 3.76 (Water and Drainage)** explains the importance of the natural watercourse system in providing essential drainage. The City Council

wishes to protect water resources by minimising the use of water, and to improve water quality. Proposals for new development will therefore be expected to take account of any effects they might have upon water and drainage and to consider using rain water as a resource water minimisation techniques to conserve water. The effects of development should be dealt with at or as near as possible to source in order to mitigate any detrimental effects and protect the resources. New development should also avoid polluting ground and surface water. Development should be served by adequate full drainage and treatment facilities. Any development involving the use of chemicals or resulting in contaminated surface water run-off should include adequate pollution prevention measures. All oil and chemical stores and other sources of polluting material should be bunded or otherwise contained. Where feasible, surface run-off and contaminated water should be treated at source, through the use of "natural" features such as reed beds. If a site is contaminated or likely to be contaminated, developers will be required to undertake site investigatory work and, where necessary, submit remediation strategies either before a planning application is determined or through a planning condition or legal obligation as appropriate.

- 5.18 *Assessment* – see paragraphs 6.42 to 6.47 of this Statement.
- 5.19 **Paragraphs 3.77 – 3.78 (Air Quality)** set out how the City Council is committed to improving air quality within Birmingham and will require development to minimise or reduce air pollution. This will be addressed in various ways, including an increase in tree cover throughout the City, modes of transport which reduce the impact of travel on air pollution, and the use of alternative clean fuels. When assessing planning applications, the implications of new development for air quality will be taken into account.
- 5.20 *Assessment* – see paragraphs 6.30 to 6.33 of this Statement.
- 5.21 **Paragraphs 3.79 – 3.79C (Energy)** indicates that the City Council is aiming to minimise energy consumption and carbon dioxide emissions within Birmingham and encourage the use of renewable energy resources. The City Council is committed towards carbon dioxide reduction and renewable energy targets, in line with the Government's target for renewable energy generation, i.e. that 10% of UK electricity requirements should be met from renewable energy sources by 2010. The City Council's current target is to acquire 15% of its own energy use from renewable energy sources and to reduce its CO2 emissions by 30% from

1990 levels by 2010. Development of renewable energy sources will be permitted where there would be no adverse effect on the character or appearance of the area; or on areas of ecological, cultural, historic or archaeological interest; or on the living conditions of nearby residents and the operation of other established uses in the vicinity. In assessing the impact of the proposed development, account will be taken of the possibility of including mitigating measures and any harmful implications of the development balanced against the potential of wider environmental benefits.

5.22 *Assessment* – see paragraphs 6.14 to 6.18 of this Statement.

5.23 **Paragraphs 4.31 – 4.32 (Maintaining the Supply of Industrial Land)**

advises that opportunities for industrial development in the built up area of the City are diminishing. In order to reduce pressure on greenfield sites the loss of industrial land to retail or other non-industrial uses will be resisted except in cases where the site is a non-conforming use. Industrial land within the “Best Urban” category<sup>4</sup> will not be released for piecemeal or poor quality developments (Retail and other non-industrial uses will not normally be permitted on sites within this category). For the purposes of the application site, it is located within an “Industrial Regeneration” zone on the UDP proposals map. **Paragraph 4.24 (Industrial Regeneration)** explains land within these areas will be safeguarded for predominantly industrial uses. However, this proposals map designation is not being carried forward to the emerging Birmingham Development Plan.

5.24 *Assessment* – see paragraph 6.19 of this Statement.

5.25 **Paragraph 6.20A (New Developments – Transportation Requirements)**

sets out how new developments can make significant demands on the transport infrastructure of the City. Where necessary, and where reasonably related in scale and kind to a proposed development, contributions will be sought through planning obligations towards transport infrastructure to secure improved accessibility by all modes. This will be particularly important in locations not well-served by modes other than the private car. Significant development proposals in such locations will be expected to address any necessary accessibility improvements.

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<sup>4</sup> Best Urban defined at Paragraph 4.20, Part ‘C’ (Industrial Land Requirements) as “*Top quality sites within the City boundaries suitable for local or incoming clients with an international/national/regional choice of locations. This includes those greenfield site which do not fall within the Premium category.*”

- 5.26 *Assessment* – see paragraphs 6.27 to 6.29 of this Statement.
- 5.27 **Paragraphs 11.26 – 11.30A (Birmingham Heartlands: Bromford)** explains that the wedge of land bounded by the M6, Tyburn/ Kingsbury Road and Chester Road is over 200 hectares in size and is one of the city’s key industrial areas where industrial regeneration will be encouraged. A number of sites in this area have been developed for industry and other uses. The area has good access (M6, A38M). Jaguar is a major employer within the area. There are also two industrial estates: Gravelly Industrial Park and the Fort Industrial Estate. The importance of these and other existing firms within the area to Heartlands and the city economy generally must not be ignored and should be reflected in any redevelopment proposals. It goes on to say, as the city’s best industrial redevelopment opportunity, industrial developments of high quality will be encouraged in Bromford, and other uses will be resisted.
- 5.28 *Assessment* – the above policy is to be abandoned upon the adoption of the Birmingham Development Plan which is discussed in detail below and should therefore be afforded limited weight. In any event, the proposed development will be maintaining the level of industrial land in the area and employment generating activities. The development will be designed to a high quality and will be a benefit to the local and wider area through pushing waste up the waste hierarchy and the energy recovery aspects of the development which will be used to supply electricity to local businesses.

#### Emerging Planning Policy

##### *Birmingham Development Plan*

- 5.29 The **Birmingham Development Plan** (BDP), formerly the Core Strategy, will set out the statutory framework to guide decisions on development and regeneration in Birmingham up to 2031. It will set out how and where new homes, jobs, services and infrastructure will be delivered and the type of places and environments that will be created. The Plan will cover the whole administrative area of the city.
- 5.30 The BDP was submitted to the Secretary of State in July 2014 with the Examination taking place between 21<sup>st</sup> October and 27<sup>th</sup> November 2014. The Inspector’s Interim Findings were published in January 2015 and in response to these findings the City Council has undertaken and submitted additional technical

work in relation to housing numbers and the Sustainability Appraisal. The Inspector since agreed with the Council a schedule of Main Modifications which, on the basis of the evidence available to date, he considers are necessary to make the Plan sound. These Modifications and the revised Sustainability Appraisal were published for consultation between 17<sup>th</sup> August and 12<sup>th</sup> October 2015.

- 5.31 Accordingly, as the Plan has reached an advanced stage of preparation regard has been given to the principal policies relating to the proposed development in the emerging BDP. The most relevant emerging policies, as amended by the 'Proposed Main Modifications', are set out below.
- 5.32 **Policy TP1 (Reducing the City's Carbon Footprint)** sets out the commitment of the City Council to achieve a 60% reduction in total carbon dioxide (CO<sub>2</sub>) emissions produced in the City by 2027 from 1990 levels. A number of actions are outlined and includes, inter alia, promoting and supporting the use of low and zero carbon energy sources and technologies (Policy TP4), promoting the use of CHP schemes and district heating (Policy TP4), encouraging the use of waste as a resource (Policy TP13), and supporting the development of new low carbon technologies (Policy TP5).
- 5.33 **Policy TP13 (Sustainable Management of the City's Waste)** seeks to prevent the production of waste wherever possible, and where this is not feasible will seek to move and manage Birmingham's waste up the waste hierarchy. The key policy objectives of the City Council will be to minimise the amount of waste created, treat waste as a resource and encourage recycling, reuse and composting. The City Council will seek to ensure that the tonnage of waste treated and managed within Birmingham is equivalent to the tonnage of waste arising. There is currently a shortfall in the number of material recycling facilities within the City and more will need to be constructed during the plan period. The City Council will seek to reduce the proportion of the City's waste which is sent to landfill. This will require an increase in alternative disposal capacity. The type of facilities needed and site location criteria are outlined in Policies TP14 and TP15.
- 5.34 **Policy TP14 (New and existing waste facilities)** sets out that the expansion of existing or the development of new waste management facilities will be supported, providing that proposals satisfy the locational criteria set out in Policy

TP15. Opportunities to improve the environmental performance of existing facilities will be explored. This approach will include:

- Encouraging the development of Material Recycling Facilities (MRF's) that would increase the City's recycling capacity and efficiency.
- Encouraging the management of food waste through existing and emerging waste management technologies and ensure that commercial and non-commercial biodegradable food wastes are treated as a resource. Schemes that promote technologies which will recover value from such wastes through techniques such as anaerobic digestion (AD) will be supported in appropriate locations in accordance with the criteria in Policy TP15.
- Seeking to reduce the amount of commercial and industrial waste sent to landfill, and encouraging new schemes and emerging technologies that enable this. Proposals to expand existing waste management facilities at the Tyseley Energy Recovery Facility plant in order to accommodate more commercial waste will be supported in principle. Gasification and pyrolysis technologies, which can generate energy and heat for District Heating Schemes, will also be supported in appropriate locations.
- Protecting existing facilities that contribute to waste management capacity, provided that they meet the criteria in Policy TP15 and do not have a negative impact on the environment and amenities. Proposals that lead to the loss of such waste management facilities, without adequate provision to replace lost waste handling capacity, will be refused. New developments which would compromise the continued operation of existing sites will also be refused.
- Supporting recycling proposals for aggregate materials subject to the locational criteria in Policy TP15. On site recycling of construction and demolition waste will be expected wherever possible and proposals for additional 'urban quarries' which increase recycling and reduce the amount of construction and demolition waste sent to landfill will be supported.

5.35 As referred to in the preceding policy, **Policy TP15 (Location of waste management facilities)** sets out locations that are considered suitable for

developments that involve the management, treatment and processing of waste.

These include:

- The Tyseley Environmental Enterprise Area which has potential to accommodate new waste and sustainable energy technologies, including recycling, Combined Heat and Power and waste recovery.
- Other industrial areas including the Core Employment Areas identified on the Policies Map.
- Sites currently or previously in use as waste management facilities.
- Appropriate sites adjacent to existing waste management facilities.

5.36 Proposals for new or expanded waste management facilities, including in the locations listed above, will be considered against the following criteria and supported where it is demonstrated that these criteria are satisfied. The criteria are set out in full below:

- The effect of the proposed waste facility upon the environment and neighbouring land uses.
- The impact of traffic generated by the proposal and the availability of alternative transit modes, such as rail and waterways.
- The need for pollution control measures appropriate to the type of waste to be processed or handled.
- The impact of proposals on residential amenity. New waste facilities will not normally be approved adjacent to existing housing and proposals for anaerobic digestion will not be approved within 250m of existing housing.
- The effect of proposals on aircraft safety.
- The design of the proposal. Careful consideration should be given to the need to minimise environmental and visual impact. Wherever feasible, waste operations should be enclosed within buildings or sealed structures in order to minimise impacts on adjacent uses from noise, ordure, vermin and wildlife. Proposals advocating open air unenclosed storage of organic odour producing material will not be supported.

- 5.37 The supporting text at **paragraph 6.90** advises that measures will be put in place to ensure that there is a reservoir of 96 ha of land available within Birmingham for industrial development, including proposals for the management and treatment of waste. It goes on to indicate that this should ensure that there is a constant supply of suitable sites for waste-related uses.
- 5.38 For the purposes of the application site, it is located within a “Core Employment Area”, a location considered suitable under Policy TP15 for developments that involve the management, treatment and processing of waste.
- 5.39 A copy of the policies map for the emerging BDP is attached at Appendix 2.

#### **APPENDIX 2 – EMERGING BIRMINGHAM DEVELOPMENT PLAN POLICIES MAP**

- 5.40 **Policy TP18 (Core employment areas)** advises that the Core Employment Areas will be retained in employment use and will be the focus of economic regeneration activities and additional development opportunities likely to come forward during the plan period. It goes on to define employment use in the context of this policy as B1b (Research and Development), B1c (Light Industrial), B2 (General Industrial) and B8 (Warehousing and Distribution) and other uses appropriate for industrial areas such as waste management, builders’ merchants and machine/tool hire centres.

## 6. ASSESSMENT

- 6.1 This section addresses the main planning issues that are likely to arise during the consideration of the planning application.
- 6.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that all planning applications be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 6.3 The Applicant considers the main issues in this case to be as follows: -
1. The principle of and need for the development
  2. Character and appearance of the area
  3. Transport and Highways
  4. Air Quality
  5. Cultural Heritage
  6. Ecology
  7. Flood Risk
- 6.4 Each issue is addressed separately below.

### Issue 1 - The principle of and need for the development

- 6.5 As a starting point, it is important to note that the proposed REC seeks to manage residual waste that will otherwise be landfilled and will generate 8.6MW of renewable electricity and heat. In light of this, it is appropriate to examine relevant waste, energy and climate change policies and strategies at a local and national level to understand the need for the development.
- 6.6 The Development Plan for the area comprises the 'saved' policies of the adopted Birmingham UDP. Paragraph 3.67 (Energy from Waste Plants) of the adopted UDP indicates that energy from waste plants are an efficient means of reducing waste for disposal and provide opportunities for energy recovery. However, it goes on to say that the re-use or recycling of waste is preferable to incinerating and the Council will therefore explore opportunities for processing household waste to reduce need for it to be incinerated.

- 6.7 The proposed REC will use a proven form of gasification to generate power and heat from RDF together with other non-recyclable wastes. RDF is a product derived from non-recyclable industrial and commercial waste which cannot be re-used or recycled and would ordinarily go to landfill. The proposed facility will have the capacity to process up to 105,000 tonnes of waste per annum which accords with the principles of Paragraph 3.67 of the adopted UDP by reducing a significant amount of waste for disposal to landfill, pushing it up the waste hierarchy, and at the same time recovering energy from the waste by generating a gross 8.6MW of electricity to supply local businesses and/or the national grid.
- 6.8 In the consideration of applications for new energy from waste facilities, Paragraph 3.67 advises that they will need to be considered in light of Paragraphs 3.65A-3.65C (Waste Treatment and Management) of the adopted UDP. Paragraph 3.65A indicates, inter alia, that new facilities are to be provided in appropriate locations and to minimise impacts on local communities, the environment, and the local transport network. The latter paragraphs develop these points with Paragraph 3.65B describing industrial areas, especially those containing other heavy or specialised industries, as locations suitable for such developments and EfW facilities likely to cause noise, disturbance, air pollution, smells and other nuisance are expected to be located within existing industrial areas. Whilst Paragraph 3.65C sets out the criteria for when considering proposals for new waste management facilities such as need, proximity to source of waste, impact on the environment and adjoining uses, impact of traffic, etc.
- 6.9 These provisions in the adopted UDP are broadly reflected in the emerging Birmingham Development Plan with Policy TP14 (New and Existing Waste Facilities) supporting gasification and pyrolysis technologies, which can generate energy and heat, in appropriate locations, and TP15 (Location of Waste Management Facilities) reaffirming industrial areas as suitable locations for waste developments and similar criteria for the consideration of planning applications as set out in Paragraph 3.65C of the adopted UDP. Further, Policy TP18 (Core Employment Areas) sets out that the 'Core Employment Areas' identified on the Policies Map will be retained in employment use and will be the focus of economic regeneration activities and additional development opportunities. Economic development in the policy is defined as Use Classes B1(b), B1(c), B2 and B8, and other uses appropriate for industrial uses such as waste management facilities.

- 6.10 Relating this to the proposed REC, the application site is located within an existing and well established industrial area adjacent to the Jaguar Land Rover manufacturing plant but separated from residential and other sensitive receptors. The site is also located in close proximity to Junction 5 of the M6 motorway offering good access and transportation links. The site is therefore located in an area regarded as suitable for waste management facilities.
- 6.11 The site is also located in an industrial estate well related to the sources of waste to be treated by the proposed REC. The waste required to operate the facility will be sourced from the local area from waste companies and operators as described in paragraph 3.11 of this Statement. Economics will play a large part in the distance waste is travelled to the site, hence waste will not be transported over long distances as it would not be viable to do so. Transportation costs will therefore be self-limiting to the distances travelled, restricting the sourcing of waste from the local area to operate the proposed facility. Accordingly, the proposed REC will be within close proximity to the sources of waste to be treated across the Birmingham area.
- 6.12 The proposed development would therefore accord with the location and proximity principles set out in Paragraphs 3.65A and 3.65B of the adopted UDP and emerging policies TP14, TP15 and TP18 of the Birmingham Development Plan.
- 6.13 Furthermore, the proposal will accord with the various criteria prescribed for the consideration of planning applications set out in Paragraph 3.65C of the adopted UDP and emerging Policy TP15 of the Birmingham Development Plan. These consider the impact of waste management facilities on, inter alia, the character and appearance of the area, amenities of neighbouring properties and impact on the local transport network. All of these issues are discussed below in the consideration of Issues 2 to 6 and each demonstrate compliance with the relevant Development Plan provisions of the aforementioned policies and other relevant specific policies in the UDP.
- 6.14 In addition to pushing waste up the hierarchy by diverting non-recyclable waste away from landfill, the proposed REC will have capacity to produce a gross 8.6MW of electricity – the equivalent of powering over 15,000 homes on a continual basis – which will be supplied to local businesses and/or the national grid.

- 6.15 It has been established that energy recovery is supported by adopted planning policy at a local level but it is also important to recognise the strong support at a national level. EN-1 sets out that 15% of energy in the UK is to come from renewable sources. This includes the contribution of energy from waste facilities, such as the proposed REC, which use waste that cannot be re-used or recycled with less environmental impact and would otherwise go to landfill. EN-3 reaffirms this by advising that the recovery of energy from combustion of waste has an increasingly important role in meeting the UK's energy needs and that the burning of waste can be deemed renewable.
- 6.16 It is clear that the proposed REC is supported at a national scale in policy and legal commitments to achieve a reduction in carbon emissions. The generation of renewable energy is a significant material consideration which weighs substantially in the applications favour.
- 6.17 The proposal therefore represents a significant and important local contribution to meeting the legally binding target the UK is required to achieve by 2020 of 15% of energy used from renewable sources. This also demonstrates compliance with Paragraphs 3.79-3.79C (Energy) of the adopted UDP which assists with the City Council's aim to minimise carbon dioxide emissions in Birmingham and the encouragement of the use of renewable energy sources.
- 6.18 Overall, compliance with the relevant adopted and emerging Development Plan policies also demonstrates how the proposed REC accords with the relevant planning policy guidance at a national level. Accordingly there is no need to demonstrate a quantitative or market need for the proposed waste management facility given that it is in accordance with an up-to-date Local Plan, in this case the 'saved' policies of the UDP.
- 6.19 With regard to the principle of the proposed industrial/warehouse building, this will be a similar use to that currently exists on the land. Therefore the proposed building will be acceptable in this location and compatible with the wider industrial estate. Furthermore, the proposed industrial/warehouse building, together with the proposed REC, will continue to maintain industrial premises availability in the area. The proposal does not introduce any other non-conforming uses into the area and therefore safeguards the industrial function of the site. Accordingly, the proposal complies with Paragraphs 4.31-4.32 (Maintaining the Supply of

Industrial Land) in the adopted UDP and emerging Policy TP18 (Core Employment Areas) of the Birmingham Development Plan.

### Issue 2 – Character and appearance of the area

- 6.20 Given the scale, form and appearance of the proposed development, the impact on the character and appearance of the local and wider area is a key consideration in the determination of the planning application.
- 6.21 In terms of the site context, the application site currently comprises a number of industrial buildings in a predominantly industrial area. There are no statutory or non-statutory landscape designations in place on the site and the nearest non-statutory designation of relevance in landscape and visual terms is the Grade II\* Registered Park and Garden at Castle Bromwich Hall. The Hall itself is Grade I Registered, as is the nearby church of St Mary and St Margaret. The Registered Park and Garden lies approximately 600m to the south-south-east of the application site, but is separated from the site by the elevated section of the M6. The locally listed Fort Dunlop building lies approximately 750m to the west of the application site, and there are a number of other Listed Buildings in the local area, notably those in the vicinity of Castle Bromwich Hall and those to the north of the Jaguar plant. Furthermore, the only Public Right of Way (PRoW) in the vicinity of the application site is a short section of public footpath associated with the parkland of Castle Bromwich Hall. There are however pedestrian walkways associated with many of the roads in the area.
- 6.22 The impact of the proposed development on the character and appearance of the area has been considered in the 'Landscape' section of the Environmental Statement that accompanies the planning application. This provides an assessment of the likely significant effects of the proposed development.
- 6.23 To minimise the impact of the development, the height of the stack and the main building have been kept as low as reasonably practicable and compliant with relevant EU Regulations. The use of cladding of variable colours and shades has been employed so as to reduce the perceived massing of the buildings. These measures have been incorporated into the design of the proposed development as part of an iterative design process.
- 6.24 In terms of the impact of the proposed development in the wider landscape, the most prominent feature would be the chimney stack serving the proposed REC.

However, the proposed stack at 55m high would be shorter than the existing stack at the Fort Dunlop power plant (60.5m in height) and the pylons which line the nearby elevated section of the M6 motorway, and would be seen in the context of a number of other nearby stacks such as those at the Jaguar plant.

- 6.25 Given the industrial nature of the proposed development, together with the context provided by the land uses surrounding the application site, the proposed development is considered to be appropriate to the setting and townscape character of the site. The proposed development would not adversely affect local landscape or townscape features or elements, and would not have any significant effects on visual amenity as experienced from locations within the local area.
- 6.26 Accordingly, the proposed development will accord with provisions of the saved policy relating to the design of new development between paragraphs 3.14 and 3.14C of the adopted UDP and emerging Policy PG3 (Place Making) of the Birmingham Development Plan which expects all new development to demonstrate high design quality, contributing to a strong sense of place.

### Issue 3 – Transport and Highways

- 6.27 The transport related effects of the proposed development have been carefully considered in the Transport Assessment (TA) that accompanies the planning application. The TA indicates that:
- The application site is well located in respect of affording future staff the opportunity to travel to key destinations and amenities by a range of non-car modes;
  - The existing vehicular network in the vicinity of the site can safely accommodate vehicular trips associated with the proposed development without detriment to the surrounding network;
  - The trip generation potential of the proposed development shows a slight increase in HGVs as a result of the proposed development in comparison to the extant use of the site. However, this is offset by a daily net reduction in overall traffic flows, demonstrating that the development will not result in a severe vehicular impact on the surrounding highway network; and

- Although the overall level of traffic is expected to be reduced as part of the proposals, they will facilitate a change in the composition of traffic using the development, leading to a slightly higher number of HGVs. The development proposals and the impact upon the surrounding highway network have therefore been considered in the context of junction capacity. Results showed that the Fort Parkway/Dunlop Way priority junction functions within its practical capacity, indicating that the proposed development would not have a noticeable impact upon the surrounding highway network.

6.28 In view of the above findings, the TA concludes that the proposed development would not result in a significant cumulative impact in respect of the performance of the surrounding highway network, resulting in an overall reduction in vehicular movements generated by the site.

6.29 Accordingly, the proposed development will accord with provisions of the saved policy relating to transportation requirements of new developments at paragraphs 6.20A of the adopted UDP.

#### Issue 4 – Air Quality

6.30 The gasification of waste can give rise to emissions of a number of pollutants with the potential to lead to air quality impacts. Therefore, an Air Quality Assessment has been prepared to accompany the planning application focusing on the potential air quality impacts associated with emissions from the main stack at the proposed REC, dust emissions during construction, as well as additional road traffic emissions and odour and bioaerosol emissions during operation.

6.31 The assessment concludes that during the construction period, the proposed development will not have a significant impact on dust and fine airborne particulate matter, subject to suitable mitigation measures being put in place, i.e. dust management plan, which can be secured by a planning condition. Similarly, odour and bioaerosol emissions will be kept to a sufficiently low level that the local effects will be insignificant.

6.32 The overall operational air quality impacts of the development are judged to be 'not significant'. This judgement takes account of the uncertainties in future predictions of road traffic emissions, and the worst-case assumptions applied in the dispersion modelling assessment.

6.33 Accordingly, the proposed development will accord with provisions of the saved policy relating to air quality between paragraphs 3.77 and 3.78 of the adopted UDP.

#### Issue 5 – Cultural Heritage

6.34 The planning application is accompanied by a Heritage Assessment which identifies a general level of prehistoric activity in the vicinity of the application site. The application site is recorded as agricultural land in the 19th-century, potentially watermeadow, and was most likely in agricultural use from the medieval period onwards. If any below-ground archaeological remains are situated within the site they are likely to have been removed or severely truncated by the construction of buildings within the proposed development site in the later 20th-century. There is no record on the Birmingham Historic Environment Record of any archaeological observations during the construction of the present buildings in the site, or of any archaeological finds from that development.

6.35 On the basis of existing baseline information, the Heritage Assessment identifies that there are no physical effects upon any known or anticipated remains by the proposed development. Furthermore, the proposed development will not harm the significance of any designated heritage assets due to alteration to their setting. The combined chimney stack associated with the proposals will be discernible in glimpsed views looking north-west from Castle Bromwich Hall Grade I Listed building, and from Castle Bromwich Hall Grade II\* Registered Park but this small change would not harm the particular heritage values which combine to form the significance of the hall and grounds. Similarly, the presence of an additional stack in proximity to Fort Dunlop Base Stores Locally Listed building would not harm the particular heritage significance of the building.

6.36 Accordingly, the proposed development will accord with provisions of the saved policy relating to cultural heritage between paragraphs 3.20 and 3.24 of the adopted UDP and emerging Policy TP12 (Historic Environment) of the Birmingham Development Plan which seeks to manage new development in ways which will make a positive contribution to the character of the historic environment.

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Issue 6 – Ecology

- 6.37 The Ecology Chapter of the Environmental Statement that accompanies the planning application explains that a Desk-Based Assessment and an Extended Phase I Habitat Survey have been undertaken to support the planning application to enable an understanding of the likely ecological effects of the Proposed Development.
- 6.38 The application site is dominated by buildings and surrounding hard standing with smaller areas of amenity grassland and ornamental planting and an area of bare ground with trees along the southern boundary.
- 6.39 No evidence of protected or notable species was found within or adjacent to the application site and the habitats present had the potential to be used by nesting birds and foraging bats. Accordingly, the overall value of the application site to such species is considered to be low.
- 6.40 As a result of the proposed development no significant effects are anticipated on statutory or non-statutory designed sites or habitats and likewise no significant effects on protected species.
- 6.41 Accordingly, the proposed development will accord with provisions of the saved policy relating to nature conservation between paragraphs 3.37 and 3.40 of the adopted UDP and emerging Policy TP8 (Biodiversity and Geodiversity) of the Birmingham Development Plan which promotes and supports the maintenance, enhancement and restoration of sites of national and local importance for biodiversity and geology.

Issue 7 – Flood Risk

- 6.42 The Environment Agency's Flood Map for Planning shows the site as within Flood Zones 2 and 3 but in an 'area benefiting from flood defences'. The Environment Agency mapping identifies flood defences along both banks of the River Tame in the vicinity of the site in the form of masonry walls and areas of high ground. Consequently, the Environment Agency's 'Map of Defended Outlines' shows the site is not affected by the 1:100 or 1:100 (including an allowance for climate change) fluvial flood events but would be affected by the 1:1000 year fluvial flood event.

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- 6.43 To assist with the consideration of flood risk, a Flood Risk Assessment (FRA) has been prepared by PFA Consulting to accompany the planning application.
- 6.44 The FRA explains that a sustainable drainage strategy, involving the implementation of SuDS, is proposed for managing the disposal of surface water runoff from the proposed redevelopment of the Fort Industrial Park. It is proposed as far as possible to maintain the existing surface water drainage arrangements but with attenuation tanks and flow controls to ensure that runoff from the site is not increased as a consequence of climate change and to provide some reduction in the rate of overall runoff from the site for short duration storms. Pollution control measures are incorporated into the surface water drainage network and will include the use of deep trapped gullies and bypass separators and/or full retention separators/interceptors.
- 6.45 To minimise residual flood risk it is proposed that any sensitive plant is situated at, or above, 83.42m AOD (1:100 + climate change flood level) and the finished floor level of the building is 150 – 300mm above the existing ground as is standard practice.
- 6.46 The overall conclusions drawn from the FRA are that the development would be appropriately safe for its lifetime taking account of the vulnerability of its users and the development would reduce flood risk during short duration storm events.
- 6.47 Accordingly, the proposed development will accord with provisions of the saved policy relating to water and drainage between paragraphs 3.71 and 3.76 of the adopted UDP and emerging Policy TP6 (Management of Flood Risk and Water Resources) of the Birmingham Development Plan which requires site specific FRAs in accordance with the requirements of the relevant national planning policy and the guidance outlined in the Birmingham Strategic FRA. As part of the FRA it is expected that the disposal of surface water will need to be demonstrated and the proposed development has shown that it will not exacerbate existing flooding and that exceedance flows will be managed.

## 7. CONCLUSIONS

- 7.1 The planning application for a Renewable Energy Centre has been made in the context of the Government's aim to work towards a 'zero waste economy' in which material resources are reused, recycled or recovered wherever possible and only disposed of as the option of last resort. The recovery of non-recyclable materials which would otherwise go to landfill accords with the principles of the waste hierarchy. Furthermore, the energy recovered in the process will contribute towards the United Kingdom's legally binding obligation to produce 15% of all electricity used from renewable sources by 2020.
- 7.2 This planning application will result in a number of specific benefits, including the recovery of up to 105,000 tonnes per annum of non-recyclable waste from the Birmingham area and the generation of renewable energy which has the capability to meet the needs of local businesses. There will be capacity to produce a gross 8.6MW of electricity – the equivalent of powering over 15,000 homes on a continual basis – therefore a significant contribution. The Renewable Energy Centre and the proposed industrial/warehouse building will offer economic benefits to the area through employment opportunities during the construction and operational phases of the respective developments. The buildings and ancillary structures will also be designed to a high standard which will positively enhance the character and appearance of the area compared to the existing industrial units. The development has also been shown to be acceptable in all other technical aspects, i.e. transport and highways, air quality and heritage.
- 7.3 The assessment of the proposal against the Development Plan has shown broad compliance with the relevant saved policies contained in the Birmingham Unitary Development Plan. Compliance has also been shown with the emerging policies set out in the Birmingham Development Plan which is currently subject of Examination.
- 7.4 Furthermore, the proposal has also been shown to be in compliance with national strategic level planning policies contained within the NPPF and the National Planning Policy for Waste, and guidance set out in the Waste Management Plan for England and both EN-1 and EN-3. These documents are significant material considerations in the planning process and indicate this proposal is acceptable.
- 7.5 The above considerations demonstrate that upon considering the significant benefits associated with the scheme against the relatively benign impacts, the

proposal, on balance, falls well within the scope of acceptability as the benefits would indeed outweigh any limited harm.

- 7.6 For this reason, it is concluded that this application for a Renewable Energy Centre and an industrial/warehouse building should be granted planning permission.

## **APPENDIX 1**

### **SCOPING OPINION DATED 8<sup>TH</sup> SEPTEMBER 2015**

## Scoping Opinion for Environmental Statement

### Town and Country Planning (Environmental Impact Assessment) Regulation 2011

Pre-app ref: 2015/06426/PA

**Erection of two buildings for renewable energy facility and industrial and storage comprising 100,000 tonnes per annum at Dunlop Way, Birmingham, B35**

#### Background and Scope of Environmental Statement

- 1.) The applicant is of the view that the proposed development falls within Category 10 of Schedule 1 to the Town and Country Planning (Environment Impact Assessment) Regulations 2011. This refers to waste disposal installations for the incineration or chemical treatment (as defined in Annex 11A to Council Directive 75/442/EEC under heading D9) of non-hazardous waste with a capacity exceeding 100 tonnes per annum, it would create around 8.6 MW of power output. The Local Planning Authority does agree, however it does consider that the proposed development falls within Category 3 (a) Schedule 2 for the electricity generation on an area exceeding 0.5 ha or Category 10 (a) for an industrial development on an area exceeding 0.5 hectares. Notwithstanding this, the Local Planning Authority respects the applicant's formal scoping request in any event.

#### Planning Policy Framework

- 2.) In addition to the National Planning Framework, local planning policies include:
  - Birmingham UDP Saved Policies (2005)
  - Draft Birmingham Development Plan (2013)
  - Places for All SPG (2001)
  - High Places SPG (2003)
  - Car Parking Guidelines SPD (2012)
  - Loss of Industrial Land for Alternative Uses SPD (2006)
  - Archaeology Strategy SPG (2003)
  - Sustainable Management of Urban Rivers and Floodplains Planning Framework SPD (2007)

#### Specific topic Areas

- 3.) The submitted Scoping Report identifies the areas and approach the applicant currently consider appropriate for inclusion within the ES.
- 4.) Air Quality and Odour - The Local Planning Authority does not object to the proposed methodology with regard to emissions, odour and construction dust.



5.) Townscape and Visual – The Local Planning Authority does not object to the proposed methodology and recommend the following representative viewpoints:

- M6 Motorway
- Major “A” roads such as Fort Parkway, Kingsbury Road, Chester Road (A452), etc.
- Railway line to the south of the site

The proposed study area of 1km should be increased further considering the likely height of the buildings of 25 metres and chimney stack of 45 metres in order to assess any impact the proposal would have upon townscape character and visual amenity of the area.

- 6.) Traffic and Transportation - The Local Planning Authority does not object to the proposed methodology in relation to the Transport Assessment.
- 7.) Hydrology & Flood Risk – The Local Planning Authority does not object to the proposed methodology
- 8.) Hydrogeology & Ground Condition – The Local Planning Authority does not object to the proposed methodology.
- 9.) Noise and Vibration – The Local Planning Authority does not object to the proposed methodology but recommends that the noise assessment should include sample night time measurements in the vicinity of the most effected premises to enable an assessment at the most sensitive times to be carried out.
- 10.) Ecology and Nature Conservation – The Local Planning Authority does not object to the proposed methodology.
- 11.) Archaeology and Cultural Heritage - The Local Planning Authority Agrees with the proposed methodology.
- 12.) Socio Economic issues – The Local Planning Authority does not object to the proposed methodology.

The Local Planning Authority has consulted various internal and external statutory consultees as part of Regulations and comments are awaited from Centro, Environment Agency, Birmingham Airport and Severn Trent and would be forwarded to you in due course.

### **Cumulative Effects**

- 15.) The submitted EIA Scoping Report identifies that the ES will consider the cumulative effect of the proposed development and other developments within the surrounding area. The Local Planning Authority considers that the following proposals should be included with this assessment:
- 2012/05409/PA - Erection of an Advanced Conversion Technology & Anaerobic Digestion facility comprising of an 8MWe pyrolysis energy from waste plant & 2MWe anaerobic digestion facility plus associated visitor centre & access, parking & landscaping at Washwood Heath Freight Yard, North of Common Lane, Birmingham, B8 2SQ
  - 2014/02762/PA - Use of site for the re-cycling of aggregates (Sui-Generis), erection of office cabin, installation of weighbridge and retention of 3 metre high palisade fencing and gates at Bromford Lane, Site D, corner junction Fort Parkway, B24 8DL
  - 2002/04647/PA - Erection of a green waste recycling facility to include machinery store/mess room, liquor collecting tank, 3m high palisade security fence/gate, six floodlighting columns (one with CCTV) and reconstruction of existing approach road at Bromford Drive adjoining Bromford public open space, B36

- 2009/03827/PA - Change of use of land to form hardstanding to provide extended area to existing green waste recycling facility at Bromford Green Waste Facility, Bromford Drive, B36
- 64307005 – Development of public waste disposal facility including construction of internal access road and parking at Tameside Drive, Birmingham, B35 7AG

### Conclusion

The Local Planning is in general agreement with the findings of the Scoping Report as a basis for assessment within the ES, subject to the recommendations listed above and any further responses to be received from statutory consultees.

**Prepared by: Mohammed Akram**

**Date: 7<sup>th</sup> September 2015**

**Signed by Area Planning Manager:**



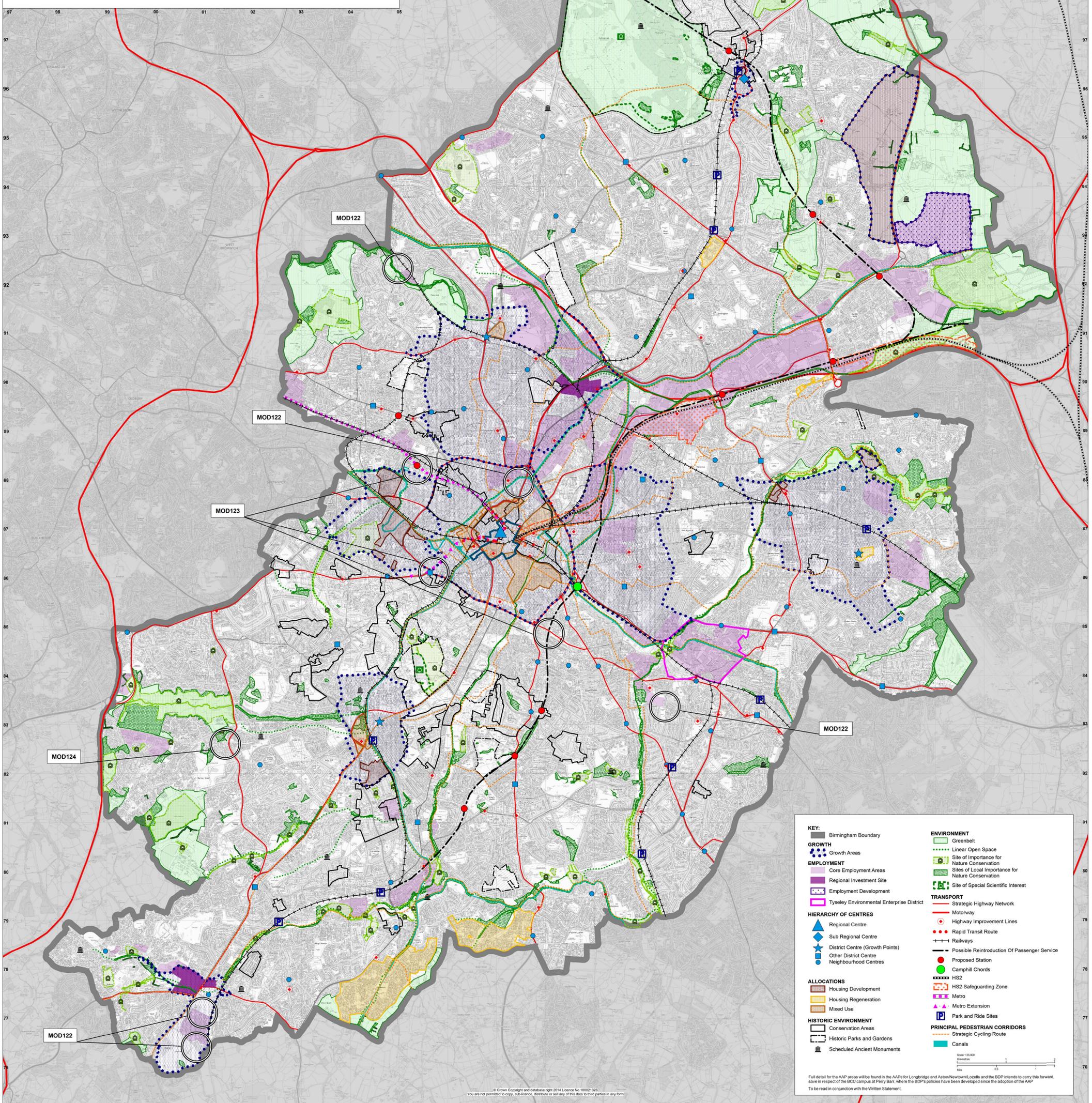
**Date:** 8/9/15

## **APPENDIX 2**

### **EMERGING BIRMINGHAM DEVELOPMENT PLAN POLICIES MAP**

# The Birmingham Development Plan Policies Map

June 2014



**KEY:**

- Birmingham Boundary**
- GROWTH**
  - Growth Areas
- EMPLOYMENT**
  - Core Employment Areas
  - Regional Investment Site
  - Employment Development
  - Tyseley Environmental Enterprise District
- HIERARCHY OF CENTRES**
  - Regional Centre
  - Sub Regional Centre
  - District Centre (Growth Points)
  - Other District Centre
  - Neighbourhood Centres
- ALLOCATIONS**
  - Housing Development
  - Housing Regeneration
  - Mixed Use
- HISTORIC ENVIRONMENT**
  - Conservation Areas
  - Historic Parks and Gardens
  - Scheduled Ancient Monuments
- ENVIRONMENT**
  - Greenbelt
  - Linear Open Space
  - Site of Importance for Nature Conservation
  - Sites of Local Importance for Nature Conservation
  - Site of Special Scientific Interest
- TRANSPORT**
  - Strategic Highway Network
  - Motorway
  - Highway Improvement Lines
  - Rapid Transit Route
  - Railways
  - Possible Reintroduction Of Passenger Service
  - Proposed Station
  - Camp Hill Chords
  - HS2
  - HS2 Safeguarding Zone
  - Metro
  - Metro Extension
  - Park and Ride Sites
- PRINCIPAL PEDESTRIAN CORRIDORS**
  - Strategic Cycling Route
  - Canals

Scale 1:25,000  
 0 0.5 1 Kilometres  
 0 0.5 1 Miles

Full detail for the AAP areas will be found in the AAPs for Longbridge and Aston/Newtown/Lozells and the BDP intends to carry this forward, save in respect of the BCU campus at Perry Barr, where the BDP's policies have been developed since the adoption of the AAP. To be read in conjunction with the Written Statement.

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